

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
NEW YORK**

----- X
KLAUBER BROTHERS INC.,
Plaintiff,

vs.

RUSSELL-NEWMAN INC. and
THE BON-TON STORES, INC.,
Defendants.

Civil Action No. 11 CIV 4985
(PGG)

**STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S
MOTION FOR ATTORNEYS'
FEES AND COSTS**

ECF Case

----- X
WHEREAS defendant The Bon-Ton Stores, Inc. ("Defendant") has served plaintiff
Klauber Brothers, Inc. ("Plaintiff") with a Motion for Attorneys' Fees and Costs;

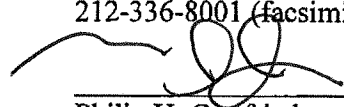
WHEREAS the deadline for Plaintiff to serve Defendant with its opposition papers is
currently April 29, 2013;

WHEREAS Plaintiff has requested an extension to May 6, 2013 to serve its opposition
papers due to scheduling and logistical conflicts, and Defendant has consented to this request;

WHEREAS this is the first request for an extension, and the requested extension would
not affect any other dates in the case,

It is hereby STIPULATED and AGREED by and between Plaintiff and Defendant,
through their respective counsel, that Plaintiff shall have up to and including May 6, 2013 to
serve Defendant with its opposition to Defendant's Motion for Attorneys' Fees and Costs; and
Defendant shall have up to and including May 17, 2013 to serve Plaintiff with its reply in further
support of its Motion.

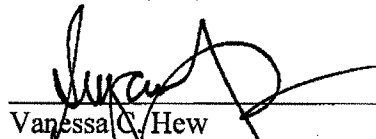
AMSTER, ROTHSTEIN & EBENSTEIN, LLP
Attorneys for plaintiff Klauber Brothers, Inc.
90 Park Avenue
New York, NY 10016
212-336-8000 (main)
212-336-8001 (facsimile)



Philip H. Gottfried
pgottfried@arelaw.com
Marc J. Jason
mjason@arelaw.com

Date: April 25, 2013

DUANE MORRIS LLP
Attorneys for defendant The Bon-Ton Stores, Inc.
1540 Broadway
New York, New York 10036-4086
Telephone: (212) 692-1000
Facsimile: (212) 692-1020



Vanessa C. Hew
vchew@duanemorris.com
Suzan Jo
sjo@duanemorris.com
Terry Parker
tparker@duanemorris.com

Date: April 26, 2013

SO ORDERED:

Honorable Paul G. Gardephe
United States District Judge

Date: _____, 2013